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November 16, 2024

Sweigert v. Goodman, 24-cv-02203-JGK-VF
Related Case: 23-cv-05875-JGK-VF

U.S. Magistrate Judge Honorable Valerie Figueredo
U.S. District Court for the Southern District of New York
500 Pearl Street, New York, N.Y. 10007
Via ECF filing

SUBJ: Request to file Motion for Leave to Amend

Dear Judge Figueredo,

1. Pursuant to the spirit of Judge Koeltl's Order of 10/31/2024, ECF 170, the *pro se* plaintiff hereby requests an opportunity to file a Motion for Leave to file a Second Amended Complaint, with a proposed Second Amended Complaint and a supporting declaration of the plaintiff.
2. The last substantive filing in this instant legal action was ECF 88, 4/03/2024. Since that time the *pro se* plaintiff has learned of new federal torts allegedly committed by the defendant that were not addressed in the related action 23-cv-5875.
3. The defendant has distributed (via interstate wires on social media fora) so-called evidence of infiltration inside the U.S. Government and the New York City Police Department (N.Y.P.D.) by a neo-Nazi White nationalist hate group, known as "Operation Paperclip" similar to Proud Boys, Aryan Nations, Ku Klux Klan, etc. According to the defendant, Operation Paperclip is a neo-Nazi White nationalists hate group working inside the U.S. Government. The *pro se* plaintiff has been branded as a modern-day Alger Hiss working with this hate group inside the U.S. Government to commit treason and deny Constitutional rights. Treason is a crime as defined by 18 U.S.C. § 2381.

4. The defendant has embedded the plaintiff's image, with the aforementioned slander, as an integral part of his commercial Jewish social media programming in New York City called "Crowdsource The Truth", so-called for a network of self-styled investigators of White nationalists hate groups (like Elon Musk, owner of X (Twitter)).

5. This "Nazi hunter" network sponsors the defendant's livestream "walk abouts" to various local New York City incidents involving Elon Musk and/or the N.Y.P.D. See *Goodman v. The City of New York*, 23-cv-09648-JGLC-GWC (S.D.N.Y. Nov. 8, 2023).

6. It is in this context that the *pro se* plaintiff has been accused of treason by the defendant. Fact statements have been distributed that the *pro se* plaintiff has been indoctrinated into this White supremacist hate group and is an active agent inside the U.S. Government whose treasonous conduct requires the death penalty. This effort appears to be part of the new "Trump retaliation and retribution wave" against perceived enemies of the President-elect or his supposed affiliates like the defendant.

7. In the interest of judicial efficiency and in light of the foregoing, the *pro se* plaintiff herein requests the opportunity to file such a motion as described above.

Respectfully, Signed 11/16/2024

D.G. SWEIGERT

CERTIFICATE OF SERVICE

Hereby certified under penalties of perjury that a true copy of this pleading has been e-mailed to YouTuber Jason Goodman at jason@21stcentury3d.com and <truth@crowdsourcethetruth.org>

Respectfully, Signed on 11/16/2024 (see above)

EXHIBITS



Defendant Jason Goodman with Nazi Operation Paperclip



Plaintiff portrayed as neo-Nazi by defendant



Plaintiff pictured in tank by defendant



Plaintiff allegedly engaging neo-Nazi Valkunt Gary



Crowdsource The Truth 
@JG_CSTT

I thought you said the other post was the last time you were going to respond so what are you still doing here apart from getting prompted by @RealGeorgeWebb1's mentally ill, wife swapping, Paperclip Nazi brother? You're obviously a Nazi sympathizer. Did Dave advise you to make these statements? He loves ginning up lawsuits are you the next contestant Gary? What's Paramount Tactical's lawyer's email address? I'm going to write a letter demanding a retraction of your false and defamatory, unfounded claims. You've committed the civil tort of per se libel.

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Plaintiff accused of membership in Operation Paperclip